

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of

Intelsat License LLC

Application for Authority to Operate  
Telkom-2, an In-orbit Satellite, at 157.0°  
E.L.

File No. SAT-A/O- \_\_\_\_\_

**APPLICATION FOR AUTHORITY TO OPERATE TELKOM-2,  
AN IN-ORBIT SATELLITE, AT 157.0° E.L.**

Intelsat License LLC (“Intelsat”), pursuant to Section 25.114 of the Federal Communications Commission’s (“FCC” or “Commission”) rules,<sup>1</sup> hereby requests authority to operate Telkom-2, an in-orbit satellite, at the 157.0° E.L. orbital location. Telkom-2 is a non-common carrier C-band satellite that Intelsat will take control over pursuant to a commercial agreement with its owner, Perusahaan Perseroan (Persero) PT Telekomunikasi Indonesia, Tbk. (“PT Telkom”), after the satellite’s arrival at 157.0° E.L. and receipt of FCC approval. Intelsat expects the satellite to be on station at 157.0° E.L. by June 7, 2017, where it will be nominally collocated with Intelsat 5 (call sign S2704).

As demonstrated below, Intelsat is legally and technically qualified to operate Telkom-2 as proposed. Grant of this application will serve the public interest by meeting customer demand and ensuring service continuity at the nominal 157° E.L. location. In accordance with the

---

<sup>1</sup> 47 C.F.R. § 25.114.

Commission's requirements,<sup>2</sup> this application has been filed electronically as an attachment to FCC Form 312 and Schedule S.

## **I. BACKGROUND AND PROPOSED OPERATIONS**

Telkom-2 was launched on November 16, 2005, and is currently located at 118° E.L. Indonesia is the satellite's current licensing administration. Pursuant to a commercial agreement between Intelsat and PT Telkom, PT Telkom will drift the satellite from 118° E.L. to 157.0° E.L. pursuant to authority from the Indonesian Administration. Upon receipt of FCC approval, Intelsat will acquire control of Telkom-2 from PT Telkom after the satellite is on-station at 157.0° E.L. Telkom-2 is currently expected to be on-station at 157.0° E.L. by June 7, 2017. Telkom has informed the Indonesian regulator that the satellite will be re-flagged to U.S. licensing after its arrival at 157.0° E.L. Operation of Telkom-2 as a U.S.-licensed satellite will be pursuant to U.S. notified ITU satellite network filings.<sup>3</sup> The end of service life of Telkom-2 is estimated to be December 2021.

Currently, Intelsat 5 is providing service at the 157.0° E.L. orbital location.<sup>4</sup> Prior to the arrival of Telkom-2, and pursuant to Commission approval, Intelsat 5 will be moved to 156.9° E.L. The chart below illustrates the frequencies that will be used by Telkom-2 at 157.0° E.L., as well as the frequencies to be used by Intelsat 5 at the 156.9° E.L. orbital location. Intelsat will coordinate the C-band operations of both satellites.

---

<sup>2</sup> 47 C.F.R. § 25.114(c).

<sup>3</sup> The ITU satellite network filings are: INTELSAT5A 157E, INTELSAT6 157E, INTELSAT7 157E, and INTELSAT8 157E.

<sup>4</sup> See *Intelsat LLC Application for Modification of the Intelsat 5 Authorization to Specify Operation at 157° E.L. Orbital Location, Application for Modification of the Intelsat 5 Authorization to Extend the License Term for the Space Station*, 30 FCC Rcd 2703 (2015) (authorizing operation of Intelsat 5 at 157.0° E.L. and extending the satellite's license term through December 31, 2020).

	Intelsat 5	Telkom-2
3700-4200 MHz	✓	✓
5925-6425 MHz	✓	✓
11450-11700 MHz	✓	
14000-14250 MHz <sup>5</sup>	✓	

## II. INTELSAT IS QUALIFIED TO HOLD THE AUTHORIZATION REQUESTED HEREIN

### A. Legal Qualifications

Intelsat is legally qualified to hold the space station authorization requested in this application. The information provided in the attached Form 312 demonstrates Intelsat's compliance with the Commission's basic legal qualifications.<sup>6</sup> In addition, Intelsat already holds multiple Commission satellite licenses, and its legal qualifications are a matter of record before the Commission.<sup>7</sup>

### B. Technical Qualifications

As demonstrated in the attached Form 312, Schedule S, and Engineering Statement, Intelsat is technically qualified to hold the authorization requested herein. Specifically, Intelsat provides the information required by Section 25.114 of the Commission's rules. In addition,

---

<sup>5</sup> Intelsat 5 is also authorized for telemetry, tracking, and command in 13999 MHz and 14498 MHz. *See id.*

<sup>6</sup> Because Telcom-2, like all other satellites licensed to Intelsat, will operate on a non-common carrier basis, Section 310(b) is not applicable to this license. *See Applications of The News Corp. Ltd. and The DIRECTV Group, Inc. (Transferors) and Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC and PEOP PAS, LLC (Transferees) for Authority to Transfer Control of PanAmSat Licensee Corp.*, Public Notice, 19 FCC Rcd 15424, 15425 n.5 (Int'l Bur. 2004).

<sup>7</sup> *See Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors and Intelsat Holdings, Ltd., Transferee, Consol. Application for Authority to Transfer Control of PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, Memorandum Opinion and Order, 21 FCC Rcd 7368, 7381 (¶ 23) (2006) ("The Commission previously has determined that PanAmSat and Intelsat are qualified to hold licenses.").

Intelsat's Engineering Statement provides information on compliance with the Commission's orbital debris mitigation rules.<sup>8</sup>

### **III. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST**

The authorization requested herein will serve the public interest by meeting customer demand and ensuring service continuity in the Asia-Pacific region from the nominal 157° E.L. orbital location.

To the extent necessary, Intelsat requests grant without milestones or a bond.<sup>9</sup> Telkom-2 is an in-orbit satellite and will operate at 157.0° E.L. on frequencies already authorized for operation by Intelsat 5 at the nominal 157° E.L. orbital location. Thus, there is no risk of warehousing.

### **IV. ORBITAL DEBRIS STATEMENT**

Intelsat has assessed and limited the probability of the Telkom-2 space station becoming a source of debris as a result of collision with large debris or other operational space stations at 157.0° E.L. When the drift of Telkom-2 is completed, Telkom-2 will operate at 157.0° E.L. and Intelsat 5, subject to receipt of FCC approval, will operate at 156.9° E.L. Telkom-2 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC-licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Telkom-2 at 157.0° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Telkom-2 at 157.0° E.L. that is the subject of an ITU filing and that is either in orbit or progressing toward launch.

---

<sup>8</sup> See Engineering Statement at 4; *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004).

<sup>9</sup> See 47 C.F.R. § 26.164 and 25.165.

Pursuant to its agreement with PT Telkom, Intelsat expects to operate Telkom-2 at 157.0° E.L. until June 2021. To the extent that Intelsat License LLC remains the U.S. licensee of Telkom-2 at the end of the satellite's maneuver life, Intelsat will dispose of the spacecraft by moving it to an altitude above the altitude established by the Inter-Agency Space Debris Coordination Committee ("IADC") formula; 5.5 kilograms of fuel has been reserved for this purpose.<sup>10</sup> In calculating the disposal orbit, Intelsat has used simplifying assumptions as permitted under the Commission's Orbital Debris Report and Order.<sup>11</sup>

#### **V. INTELSAT ACCEPTS SECTION 316 PETITION CONDITIONS**

Intelsat understands and accepts that its license to operate Telkom-2 at 157.0° E.L. will be conditioned as follows:

- (a) Intelsat shall remain a signatory to the Public Services Agreement between Intelsat and the International Telecommunications Satellite Organization ("ITSO") that was approved by the ITSO Twenty-fifth Assembly of Parties, as amended.
- (b) No entity shall be considered a successor-in-interest to Intelsat under the ITSO Agreement for licensing purposes unless it has undertaken to perform the obligations of the Public Services Agreement approved by the Twenty-fifth Assembly of Parties, as amended.<sup>12</sup>

---

<sup>10</sup> See Engineering Statement at 5.

<sup>11</sup> *Mitigation of Orbital Debris*, Second Report and Order, 19 FCC Rcd 11567 (2004).

<sup>12</sup> See *Petition of the Int'l. Telecomms. Satellite Org. under Section 316 of the Commc'ns Act*, as amended, IB 06-137, File No. SAT-MS-20060710-00076, Order of Modification, 23 FCC Rcd 2764, 2769-71 (¶¶11-13) (Int'l Bur. 2008).

**VI. CONCLUSION**

In light of the foregoing, Intelsat respectfully requests that the Commission grant the authorization requested herein.

Respectfully submitted,

*/s/ Susan H. Crandall*

Susan H. Crandall  
Associate General Counsel  
Intelsat Corporation

Jennifer D. Hindin  
WILEY REIN LLP  
1776 K Street, N.W.  
Washington, DC 20006

January 24, 2017

**Exhibit A**  
**FCC Form 312, Response to Question 34: Foreign Ownership**

The Commission previously approved foreign ownership in Intelsat License LLC (“Intelsat”), in the *Intelsat-Serafina Order*.<sup>1</sup> In December 2009 and October 2011, the Commission also approved *pro forma* changes in Intelsat’s foreign ownership.<sup>2</sup> There have been no other material changes to Intelsat’s foreign ownership since the date of the *Intelsat-Serafina Order*.

---

<sup>1</sup> *Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22151 (2007).

<sup>2</sup> *See Intelsat North America LLC, Intelsat LLC, PanAmSat Licensee Corp., PanAmSat H-2 Licensee Corp., and Intelsat New Dawn Company, Ltd., Applications for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20091125-00128, SAT-T/C-20091125-00124, SAT-T/C-20091125-00127, SAT-T/C-20091125-00125, SAT-T/C-20091125-00126, SES-T/C-20091125-01505, SES-T/C-20091125-01502, SES-T/C-20091125-01506, SES-T/C-20091125-01504 and SES-T/C-20091125-01503 (granted Dec. 3, 2009); *Intelsat Application for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, SES-T/C-20110812-00963 (granted Oct. 13, 2011), and 0004825139 (granted Oct. 19, 2011).

**Exhibit B**  
**FCC Form 312, Response to Question 36: Cancelled Authorizations**

Intelsat License LLC (“Intelsat”) has never had an FCC license “revoked.” However, on June 26, 2000, the International Bureau “cancelled” two Ka-band satellite authorizations issued to a former Intelsat entity, PanAmSat Licensee Corp. (“PanAmSat”),<sup>3</sup> based on the Bureau’s finding that PanAmSat had not satisfied applicable construction milestones.<sup>4</sup> In that same order, the Bureau denied related applications to modify the cancelled authorizations. PanAmSat filed an application for review of the Bureau’s decision, which the Commission denied, and subsequently filed an appeal with the United States Court of Appeals for the District of Columbia Circuit, which was dismissed in January 2003 at PanAmSat’s request. Notwithstanding the fact that the Bureau’s action does not seem to be the kind of revocation action contemplated by question 36, Intelsat is herein making note of the decision in the interest of absolute candor and out of an abundance of caution. In any event, the Bureau’s action with respect to PanAmSat does not reflect on Intelsat’s basic qualifications, which are well-established and a matter of public record.

---

<sup>3</sup> All licenses previously held by PanAmSat Licensee Corp. have been assigned to Intelsat License LLC. See IBFS File Nos. SAT-ASG-20101203-00252 (granted Dec. 23, 2010), SES-ASG-20101203-0150 (granted Dec. 20, 2010), and SES-ASG-20101206-01502 (granted Dec. 20, 2010).

<sup>4</sup> See *PanAmSat Licensee Corp.*, Memorandum Opinion and Order, 15 FCC Rcd 18720 (IB 2000).



**Exhibit C**  
**FCC Form 312, Response to Question 40:**  
**Officers, Directors, and Ten Percent or Greater Shareholders**

The officers and directors/managers of Intelsat License LLC are as follows:

Officers:

Jacques Kerrest, Chairman  
Franz Russ, Deputy Chairman  
Michelle Bryan, Secretary  
Mirjana Hervy, Director, Finance

Board of Managers:

Jacques Kerrest  
Franz Russ  
Michelle Bryan

The business address of all Intelsat License LLC officers and members of the Board of Managers is:  
4 rue Albert Borschette  
L-1246 Luxembourg

Intelsat License LLC is a Delaware limited liability company that is wholly owned by Intelsat License Holdings LLC, also a Delaware limited liability company. Intelsat License Holdings LLC is wholly owned by Intelsat Jackson Holdings S.A., a Luxembourg company. Intelsat Jackson Holdings S.A. is wholly owned by Intelsat (Luxembourg) S.A., a Luxembourg company. Intelsat (Luxembourg) S.A. is wholly owned by Intelsat Investments S.A., a Luxembourg company. Intelsat Investments S.A. is wholly owned by Intelsat Holdings S.A., a Luxembourg company. Intelsat Holdings S.A. is wholly owned by Intelsat Investment Holdings S.à r.l., a Luxembourg company. Intelsat Investment Holdings S.à r.l. is wholly owned by Intelsat S.A., a Luxembourg company. Each of these entities may be contacted at the following address: 4 rue Albert Borschette, L-1246 Luxembourg.

Intelsat S.A.'s ownership was approved by the Commission as part of the *Intelsat-Serafina Order* and the recent Intelsat Pro Forma and is incorporated by reference. *See Intelsat Holdings, Ltd. and Serafina Holdings Limited, Consolidated Application for Consent to Transfer of Control of Holders of Title II and Title III Authorizations*, Memorandum Opinion and Order, 22 FCC Rcd 22151 (2007) ("*Intelsat-Serafina Order*"); *Intelsat Application for Pro Forma Transfer of Control*, File Nos. SAT-T/C-20110810-00160, SAT-T/C-20110811-00161, SES-T/C-20110811-00948, SES-T/C-20110812-00963 (granted Oct. 13, 2011), and 0004825139 (granted Oct. 19, 2011) ("*Intelsat Pro Forma*"). On May 16, 2012, the International Bureau granted an application to transfer control of Intelsat pursuant to a public offering of newly issued voting shares by Intelsat, subsequent voting share sales by current shareholders and possible private placements of newly issued voting shares. *In the Matter of Intelsat Global Holdings, S.A., Applications to Transfer Control of Intelsat Licenses and Authorizations from BC Partners Holdings Limited to Public Ownership*, Order, DA 12-768 (rel. May 16, 2012). This change of control has not yet been fully consummated.